REMARKS

In the final Office Action, the Examiner rejects claims 1-7, 9-12, and 14-22 under

35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,999,929 A to Goodman

(hereinafter "GOODMAN"). Applicants respectfully traverse this rejection.

By way of the Amendment, Applicants propose amending claims 1-3, 7, 9, 10, 12,

14, 15, and 17-19 to improve form. No new matter would be added by the present

Amendment. Claims 1-7, 9-12, and 14-22 are pending.

Rejection under 35 U.S.C. § 102(b) based on GOODMAN

Claims 1-7, 9-12, and 14-22 stand rejected under 35 U.S.C. § 102(b) as allegedly

anticipated by GOODMAN. Applicants respectfully traverse this rejection.

A proper rejection under 35 U.S.C. § 102 requires that a reference teach every

aspect of the claimed invention. Any feature not directly taught must be inherently

present. See M.P.E.P. § 2131. GOODMAN does not disclose the combination of features

recited in Applicant's claims 1-7, 9-12, and 14-20.

Independent claim 1, amended as proposed, is directed to a method performed by

a computer system. The method includes retrieving, by a processor associated with the

computer system, a first plurality of uniform resource locators (URLs), where one or

more URLs of the first plurality of URLs include a parameter string comprising at least

one parameter and a value associated with the at least one parameter; selecting, by a

processor associated with the computer system, one or more parameters present in

parameter strings of the first plurality of URLs; selecting, by a processor associated with

the computer system, a first URL from the retrieved first plurality of URLs, where the

first URL includes the selected one or more parameters; generating, by a processor associated with the computer system, a second plurality of different URLs having different parameter combinations of the one or more selected parameters; retrieving, by a processor associated with the computer system, content using the first URL; retrieving, by a processor associated with the computer system, content using the second plurality of different URLs; comparing, by a processor associated with the computer system, the content retrieved using the first URL to the content retrieved using the second plurality of different URLs; identifying, based on the comparing, one of the parameter combinations, that, when present in a particular URL, results in retrieving content that is approximately the same as the content corresponding to the first URL, the identifying being performed by a processor associated with the computer system; and generating, by a processor associated with the computer system, one or more URL rewrite rules based on the identified one of the parameter combinations. GOODMAN does not disclose or suggest this combination of features.

For example, GOODMAN does not disclose or suggest retrieving, by a processor associated with the computer system, a first plurality of uniform resource locators (URLs), where one or more URLs of the first plurality of URLs include a parameter string comprising at least one parameter and a value associated with the at least one parameter, as recited in claim 1, amended as proposed. The Examiner relies on col. 5, lines 1-4 of GOODMAN for allegedly disclosing "receiving a first uniform resource locator (URL)" (final Office Action, p. 2). Applicants respectfully submit that this section (or any other section) of GOODMAN does not disclose or suggest the above-noted feature of claim 1, amended as proposed.

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Col. 5, lines 1-4 of GOODMAN disclose:

> As is conventional, each link in a retrieved Web page is in the form of a URL, and the link referral system 10 can identify links by identifying the URLs that are provided in the Web page.

This section of GOODMAN discloses identifying URLs that are provided on a Web page. This section of GOODMAN does not disclose or suggest a parameter string comprising at least one parameter and a value associated with the at least one parameter. Therefore, this section of GOODMAN does not disclose or suggest retrieving, by a processor associated with the computer system, a first plurality of uniform resource locators (URLs), where one or more URLs of the first plurality of URLs include <u>a</u> <u>parameter string comprising at least one parameter and a value associated with the at least</u> <u>one parameter</u>, as recited in claim 1, amended as proposed.

In fact, the term "parameter" does not appear anywhere in the disclosure of GOODMAN. Furthermore, none of the example URLs disclosed by GOODMAN include a parameter string that includes at least one parameter and a value associated with the at least one parameter. Rather, all the example URLs disclosed by GOODMAN only disclose strings that are pathname components (see col. 7, lines 29, 33, 36, 38, and 39, and col. 8, lines 6-9 and lines 47-48 of GOODMAN).

Furthermore, GOODMAN does not disclose or suggest retrieving, by a processor associated with a computer system, content using a second plurality of different URLs having different parameter combinations of one or more parameters selected from parameter strings that include at least one parameter and a value associated with the at least one parameter, as recited in amended claim 1. The Examiner relies on col. 7-8, lines 24-53 of GOODMAN for allegedly disclosing this feature (final Office Action, p. 3). Applicant will assume the Examiner is relying on col. 7, line 24 to col. 8, line 53 of

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GOODMAN. Applicants submit that this section (or any other section) of GOODMAN does not disclose or suggest the above-noted feature of claim 1, amended as proposed.

Col. 7, line 24 to col. 8, line 53 of GOODMAN disclose a method of determining a new re-write rule for URLs. This section of GOODMAN discloses that the Web page analyzer compares each Web page in a cache with every other Web page in the cache to find matching pages. For each pair of matching pages, the Web page analyzer applies all previously-established rules to determine if the URLs corresponding to the two matching pages are identical. If, after all the re-write rules have been applied, the two URLs are not identical, the Web page analyzer determines that a new rule needs to be created. The new rule is created by finding the shortest substitution rule that changes one of the URLs into the other URL. The Web page analyzer then applies the new rule to the URL to see if the result is a URL of an actual Web page stored in the cache. If the Web page analyzer determines that the URLs match, it increments a "hits" counter for the new rule. If the URLs do not match, a "misses" counter is incremented for the new rule. After applying the re-write rule to all the pages in the matching page list, the Web page analyzer will store the new re-write rule if the ratio of "misses" to "hits" is lower than a threshold. If the ratio is higher than the threshold, the Web page analyzer makes the rule more specific by adding more steps to it.

Therefore, this section of GOODMAN discloses finding a pair of matching Web pages in a cache and applying existing re-write rules to the corresponding URLs to determine if the URLs can be made identical. If the existing re-write rules do not result in identical URLs, the method of GOODMAN generates a new re-write rule by finding a substitution that turns one of the URLs into the other URL.

This section of GOODMAN does not disclose or suggest <u>one or more parameters selected from parameter strings that include at least one parameter and a value associated with the at least one parameter</u>. Therefore, this section of GOODMAN cannot disclose or suggest <u>different parameter combinations of one or more parameters selected from parameter strings that include at least one parameter and a value associated with the at least one parameter.</u>

Furthermore, this section of GOODMAN discloses comparing every Web page in a cache with every other Web page in the cache. Even if it assumed, for the sake of argument, that comparing Web pages in a cache can be reasonably interpreted as retrieving content <u>using a plurality of URLs</u> (a point Applicants do not concede), this section of GOODMAN compares Web pages without any analysis or comparison of the corresponding URLs of the Web pages. Only after two Web pages are deemed identical does the method of GOODMAN turn to analyzing the URLs corresponding to the matched Web pages.

Therefore, this section (or any other section) of GOODMAN does not disclose or suggest retrieving, by a processor associated with a computer system, content using a second plurality of different URLs having different parameter combinations of one or more parameters selected from parameter strings that include at least one parameter and a value associated with the at least one parameter, as recited in amended claim 1.

Moreover, GOODMAN does not disclose or suggest <u>identifying</u>, based on comparing content retrieved using a first URL to content retrieved using a plurality of different URLs, <u>a parameter combination</u>, that, when present in a particular URL, results in retrieving content that is approximately the same as content corresponding to the first

URL, the identifying being performed by a processor associated with a computer system, as also recited in claim 1, amended as proposed.

The Examiner relies on col. 7-8, lines 24-53 of GOODMAN for allegedly disclosing "identifying a parameter combination form the plurality of URLs that corresponds to content that is approximately the same as content corresponding to the first URL" (final Office Action, p. 3). Applicant will assume the Examiner is relying on col. 7, line 24 to col. 8, line 53 of GOODMAN. Applicants disagree with the Examiner's interpretation of GOODMAN.

Col. 7, line 24 to col. 8, line 53 of GOODMAN disclose a method of determining a new re-write rule for URLs. This section of GOODMAN discloses that the Web page analyzer compares each Web page in a cache with every other Web page in the cache to find matching pages. For each pair of matching pages, the Web page analyzer applies all previously-established rules to determine if the URLs corresponding to the two matching pages are identical. If, after all the re-write rules have been applied, the two URLs are not identical, the Web page analyzer determines that a new rule needs to be created. The new rule is created by finding the shortest substitution rule that changes one of the URLs into the other URL. The Web page analyzer then applies the new rule to the URL to see if the result is a URL of an actual Web page stored in the cache. If the Web page analyzer determines that the URLs match, it increments a "hits" counter for the new rule. If the URLs do not match, a "misses" counter is incremented for the new rule. After applying the re-write rule to all the pages in the matching page list, the Web page analyzer will store the new re-write rule if the ratio of "misses" to "hits" is lower than a

threshold. If the ratio is higher than the threshold the Web page analyzer makes the rule more specific by adding more portions of it.

This section of GOODMAN does not disclose or suggest anything that could be reasonably interpreted as corresponding to a parameter combination. Therefore, this section of GOODMAN does not disclose or suggest identifying, based on comparing content retrieved using a first URL to content retrieved using a plurality of different URLs, a parameter combination, that, when present in a particular URL, results in retrieving content that is approximately the same as content corresponding to the first URL, the identifying being performed by a processor associated with a computer system, as recited in claim 1, amended as proposed.

In the Response to Arguments section of the final Office Action, the Examiner alleges that eliminating portions of URLs of a perspective series of URLs corresponds to retrieving content using a plurality of different URLs having different parameter combinations of one or more selected parameters as claimed (final Office Action, p. 15). Without acquiescing in the Examiner's allegation, Applicants propose amending claim 1 to recite selecting one or more parameters present in parameter strings of the first plurality of URLs, where the parameter strings comprise at least one parameter and a value associated with the at least one parameter. No portion of a URL disclosed by GOODMAN includes at least one parameter and a value associated with the at least one parameter.

The Examiner further relies on the example disclosed in col. 8, lines 1-9 of GOODMAN, which discloses that "the shortest rule to change 'http://www.netscape.com/index.html' to 'HTTP://netscape.com/index.html' is to replace

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'www' with '' (that is, delete 'www')." (final Office Action, p. 16). Therefore, the

Examiner appear to rely on "www" as a parameter combination. However, "www" was

not selected from <u>a string that includes at least one parameter and a value associated with</u>

<u>the at least one parameter</u>, as would be required by claim 1, amended as proposed, based

on the Examiner's interpretation of GOODMAN.

For at least the foregoing reasons, Applicants submit that claim 1 is not

anticipated by GOODMAN. Accordingly, Applicants respectfully request that the

rejection of claim 1 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and

withdrawn.

Claims 2-6 depend from claim 1. Therefore, these claims are not anticipated by

GOODMAN for at least the reasons set forth above with respect to claim 1. Accordingly,

Applicants respectfully request that the rejection of claims 2-6 under 35 U.S.C. § 102(b)

based on GOODMAN be reconsidered and withdrawn. Moreover, these claims are not

anticipated by GOODMAN for reasons of their own.

For example, claim 2, amended as proposed, recites that a second plurality of

different URLs includes the first URL with no parameters, the first URL with one

parameter of the one or more parameters, and the first URL with two or more of the one

or more parameters. The Examiner relies on col. 7, lines 24-28 of GOODMAN for

allegedly disclosing this feature (final Office Action, p. 4). Applicants disagree with the

Examiner's interpretation of GOODMAN.

Col. 7, lines 24-28 of GOODMAN disclose:

> In generating the URL re-write rules, the Web page analyzer 15 generally processes the URL from
> the outward most portions of the respective World Wide Web addresses, eliminating portions of
> the respective series, as defined by the separators, to determine candidate URLS.

This section of GOODMAN discloses processing URLs from the outward most portions of the addresses, as defined by separators, to determine candidate URLs. This section of GOODMAN does not disclose or suggest a URL with no parameters, a URL with one parameter, and a URL with two or more parameters. Therefore, this section of GOODMAN does not disclose or suggest that a second plurality of different URLs includes the first URL with no parameters, the first URL with one parameter of the one or more parameters, and the first URL with two or more of the one or more parameters, as recited in claim 2, amended as proposed.

For at least these additional reasons, Applicants submit that claim 2 is not anticipated by GOODMAN.

Independent claims 7, 12, 17, and 18, amended as proposed, recite features similar to, yet possibly of different scope than, features discussed above with respect to claim 1. Therefore, these claims are not anticipated by GOODMAN for at least reasons similar to the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejection of claims 7, 12, 17, and 18 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 9-11 depend from claim 7. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 7. Accordingly, Applicants respectfully request that the rejection of claims 9-11 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 14-16 depend from claim 12. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 12.

Accordingly, Applicants respectfully request that the rejection of claims 14-16 under 35

U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 19 and 21 depend from claim 17. Therefore, these claims are not

anticipated by GOODMAN for at least the reasons set forth above with respect to claim

17. Accordingly, Applicants respectfully request that the rejection of claims 19 and 21

under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 20 and 22 depend from claim 18. Therefore, these claims are not

anticipated by GOODMAN for at least the reasons set forth above with respect to claim

18. Accordingly, Applicants respectfully request that the rejection of claims 20 and 22

under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Conclusion

In view of the foregoing proposed amendments and remarks, Applicants

respectfully request the Examiner's reconsideration of this application, and the timely

allowance of the proposed pending claims. Applicants respectfully request that the

Examiner enter the amendment because the proposed amendment places the present

application in condition for allowance. In addition, Applicants respectfully submit that

entry of this proposed amendment would place the application in better form for appeal in

the event that the application is not allowed.

As Applicants' remarks with respect to the Examiner's rejections are sufficient to

overcome these rejections, Applicants' silence as to assertions by the Examiner in the

Office Action or certain requirements that may be applicable to such assertions (e.g.,

whether a reference constitutes prior art, reasons to modify a reference and/or to combine

references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

While the present application is now believed to be in condition for allowance, should the Examiner find some issue to remain unresolved, or should any new issues arise which could be eliminated through discussions with Applicants' representative, then the Examiner is invited to contact the undersigned by telephone in order to expedite prosecution of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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